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RECEIVED

JAN 01 2025

Clerk, U.S. District Court
Juneau, AK

7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF ALASKA**

10
11 Timothy L. Bradley, Plaintiff Pro Se

Case No.: 1:24-CV-00017-SLG

12
13 V.

**PLAINTIFF'S REQUEST FOR JUDICIAL
NOTICE**

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15 Nationstar Mortgage LLC, et al.,
16 Defendants
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21 **PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE**

22
23 **TO THE HONORABLE COURT, DEFENDANTS, AND THEIR COUNSEL OF RECORD:**

24 Pursuant to Federal Rule of Evidence 201(b), Plaintiff Timothy L. Bradley respectfully requests that the
25 Court take judicial notice of the following publicly recorded documents and exhibits that have been filed
26 in the case docket. These documents are not subject to reasonable dispute, as they are matters of public
27 record and their accuracy can be readily determined.
28

01/02/25 PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE

1 of 5

DOCUMENTS AND FACTS FOR JUDICIAL NOTICE

Exhibit KK includes four pages of the Nationstar Mortgage Consent Order, including the signature page signed by Nationstar Mortgage LLC President and CEO on December 7th, 2020. It also contains screenshots from the NMLS Public Access search and the Alaska Banking and Securities search, showing that United Mortgage Corporation of America is not authorized to conduct business in Alaska. Additionally, the substitution of trustee document, previously submitted as Exhibit N, is included for further consideration.

1. Nationstar Mortgage LLC, doing business as Mr. Cooper, entered into a multi-state settlement agreement, consent order 20-198-C, dated December 7th, 2020.
2. This order, issued by the Alaska Department of Commerce, Division of Banking and Securities, highlights systemic deficiencies, including wrongful foreclosures, inadequate documentation practices, Foreclosure and Pre-Foreclosure Failures, Consumer Complaint Handling to name a few.
3. This public document is available at the Alaska Division of Banking and Securities website under enforcement orders (<https://www.commerce.alaska.gov/web/dbs/enforcementorders.aspx>).2020
4. The substitution of trustee document, previously submitted as Exhibit N, demonstrates significant irregularities, including:
 - a. Identical handwriting in both the notary acknowledgment and the primary signature, raising concerns about the independence and validity of the notary's certification.
 - b. These discrepancies cast doubt on the legitimacy of the substitution of trustee, which is a critical document in the foreclosure process.
5. This document is relevant to Plaintiff's motion to rescind the foreclosure sale, as the validity of the foreclosure depends on the validity of this substitution of trustee.
6. Through a review of the Alaska Department of Commerce and economic development, Division of Banking and Securities and the Nationwide Mortgage Licensing System (NMLS) Consumer Access website (<https://www.nmlsconsumeraccess.org/>), it is established that United Mortgage

1 Corporation of America:

2 a. Did not hold a valid business license or registration in the State of Alaska at the time of loan
3 origination in 2005.(defendants judicial notice exhibit 1- DOT)

4 b. Was not licensed or registered as a foreign corporation in Alaska at the time of the assignment of
5 the mortgage on June 4, 2020.(previously submitted exhibit B)

6
7 c. Nationwide Mortgage Licensing System (NMLS) Consumer Access website confirms that
8 United Mortgage Corporation of America is not licensed or authorized to conduct mortgage
9 business in Alaska, as the state is not listed among its approved jurisdictions.
10

11 7. These findings raise questions about the validity of United Mortgage Corporation of America's
12 mortgage-related activities, including the 2020 assignment.
13

14 **LEGAL RELEVANCE**

15 9. These documents and facts directly support Plaintiff's motion to rescind the foreclosure sale and
16 motion to file a second amended complaint.
17

18 10. They highlight material deficiencies in the Defendants' actions and the involvement of unlicensed
19 entities, further undermining the validity of the foreclosure.
20

21 **AVAILABILITY OF DOCUMENTS**

22 The documents referenced herein are matters of public record and can be readily accessed online or
23 through the Alaska Division of Banking and Securities and the Nationwide Mortgage Licensing System
24 Consumer Access portal. They are therefore appropriate for judicial notice under Federal Rule of
25 Evidence 201(b), as their authenticity and content are not subject to reasonable dispute
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1 Respectfully submitted,

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3 X

4 Timothy L. Bradley, Pro Se

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11 **Affidavit of Truth**

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13 I, Timothy L. Bradley, swear under penalty of perjury that the facts stated herein are true and correct

14
15 Date: January 2nd 2025, in Juneau Alaska

16 Signature:

17 Timothy L. Bradley

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3 **Certificate of Service**

4 I hereby certify that on January 3rd 2025, I served a true and correct copy of the foregoing request for
5 judicial notice by USPS First-Class Mail to:
6

7 • **Justin Balser**

8 Troutman Pepper Hamilton Sanders LLP
9 100 Spectrum Center Drive, Suite 1500
10 Irvine, California 92614
11

12 • **Timothy Pomeroy**

13 Aldridge Pite LLP
14 3333 Camino Del Rio South, Suite 225
15 San Diego, California 92108
16

17 **Date:** January 3rd 2025, in Juneau Alaska

18 **Signature:**

Timothy L. Bradley 1/2/25

19 **Timothy L. Bradley**
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